

- ORIGINAL -

FILED

UNDER

SEAL

1
2 **ANSWER OF ASSOCIATION OF AMERICAN**
 INTERNATIONAL MEDICAL GRADUATES, INC.
 TO AMENDED COMPLAINT OF PLAINTIFF

3
4 Defendant Association of American International Medical Graduates, Inc. ("Defendant" or
 5 "AAIMG") Answers the First, Fourth, Seventh and Eighth claims of the Amended Complaint.
 6 Defendant is simultaneously moving to dismiss the Second, Third, Fifth and Sixth claim of the
 7 Amended Complaint pursuant to Fed.R.Civ.P. 12(b)(6). Defendant is simultaneously moving to
 8 dismiss the Complaint pursuant to Fed.R.Civ.P. 12(b)(3) and files this answer without waiving that
 9 motion. Defendant is also simultaneously moving to dismiss the Second, Third, Fifth and Sixth
 10 claims of the Amended Complaint pursuant to Fed.R.Civ.P. 12(b)(6).

11
12 1. The first paragraph of the Plaintiff's Amended Complaint merely characterizes the
 13 Complaint and no answer is required. To the extent that an answer is required, the allegations are
 14 denied.

15 2. Defendant denies the allegations of paragraph 2 of Plaintiff's Amended Complaint.

16 3. Defendant admits the allegations of sub-paragraphs 3(a), (b) and (c) and of 3(g) and
 17 (h) of Plaintiff's Amended Complaint. Defendant admits that Hough and Fredrick are a married
 18 couple, with a residence in Sarasota County, Florida and are owners of EIC, Inc. and EIC, LLC as
 19 alleged in sub-paragraph (f). Defendant denies the remaining allegations in sub-paragraph 3(f) and
 20 the allegations of sub-paragraphs 3(d) and 3(e) of Plaintiff's Amended Complaint. Defendant is
 21 without knowledge or information sufficient to admit or deny the allegation concerning the "aka"
 22 designations alleged in paragraph 3(i) and therefore those allegations are denied.

23
24 4. Defendant admits the allegations of paragraph 4 of Plaintiff's Amended Complaint.

25
26 5. Defendant is without knowledge or information to either admit or deny the
 27 allegations in paragraph 5 of Plaintiff's Amended Complaint and, therefore, the same are denied.

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- 1 6. Defendant denies the allegations of paragraph 6 of Plaintiff's Amended Complaint.
- 2 7. Defendant denies the allegations of paragraph 7 of Plaintiff's Amended Complaint.
- 3 8. The allegations of this paragraph are descriptive in nature and do not require an
4 answer. To the extent an answer is required, the allegations of this paragraph are denied.
- 5 9. The allegations of this paragraph are descriptive in nature and do not require an
6 answer. To the extent an answer is required, the allegations of this paragraph are denied.
- 7 10. The allegations of this paragraph are descriptive in nature and do not require an
8 answer. To the extent an answer is required, the allegations of this paragraph are denied.
- 9 11. Defendant denies the allegations of paragraph 11 of Plaintiff's Amended Complaint.
- 10 12. Defendant denies the allegations of paragraph 12 of Plaintiff's Amended Complaint.
- 11 13. Defendant denies the allegations of paragraph 13 of Plaintiff's Amended Complaint.
- 12 14. Defendant denies the allegations of paragraph 14 of Plaintiff's Amended Complaint.
- 13 15. Defendant denies the allegations of paragraph 15 of Plaintiff's Amended Complaint.
- 14 16. Defendant denies the allegations of paragraph 16 of Plaintiff's Amended Complaint.
- 15 17. Defendant denies the allegations of paragraph 17 of Plaintiff's Amended Complaint.
- 16 18. Defendant denies the allegations of paragraph 18 of Plaintiff's Amended Complaint.
- 17 19. Defendant is without knowledge or information to either admit or deny the
18 allegations in paragraph 19 of Plaintiff's Amended Complaint and, therefore, the same are denied.
- 19 20. Defendant is without knowledge or information to either admit or deny the
20 allegations in paragraph 20 of Plaintiff's Amended Complaint and, therefore, the same are denied.
- 21 21. Defendant is without knowledge or information to either admit or deny the
22 allegations in paragraph 21 and in footnotes 1, 2 and 3 of paragraph 21 of Plaintiff's Amended
23 Complaint and, therefore, the same are denied.
- 24
- 25
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- 27
- 28

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1 22. Defendant is without knowledge or information to either admit or deny the
2 allegations in paragraph 22 of Plaintiff's Amended Complaint and, therefore, the same are denied.
3
4 23. Defendant is without knowledge or information to either admit or deny the
5 allegations in paragraph 23 of Plaintiff's Amended Complaint and, therefore, the same are denied.
6
7 24. Defendant denies the allegations of paragraph 24 of Plaintiff's Amended Complaint.
8
9 25. Defendant denies the allegations of paragraph 25 of Plaintiff's Amended Complaint.
10
11 26. Defendant admits the allegations of paragraph 26 of Plaintiff's Amended Complaint.
12
13 27. Defendant admits the allegations of paragraph 27 of Plaintiff's Amended Complaint.
14
15 28. Defendant admits the allegations of the first two sentences of paragraph 28 of
16 Plaintiff's Amended Complaint. Defendant denies the remaining allegations of paragraph 28.
17
18 29. Defendant admits the allegations of the first two sentences of paragraph 29 of
19 Plaintiff's Amended Complaint. Defendant denies the remaining allegations of paragraph 29 of
20 Plaintiff's Amended Complaint.
21
22 30. Defendant denies the allegations in the paragraph 30 of Plaintiff's Amended
23 Complaint.
24
25 31. Defendant denies that Fredrick's primary offices are in Gardner, Massachusetts.
26 Defendant admits the remaining allegations of paragraph 31 of Plaintiff's Amended Complaint.
27
28 32. Defendant admits the allegations of paragraph 32 of Plaintiff's Amended Complaint.
29
30 33. Defendant admits that Hough is married to David L. Fredrick. Defendant admits the
31 last two sentences of paragraph 33 of Plaintiff's Amended Complaint. Defendant denies the
32 remaining allegations of paragraph 33 of Plaintiff's Amended Complaint.
33
34. Defendant denies the allegations of paragraph 34 of Plaintiff's Amended Complaint.
35
36 ...
37
38 ...

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1 35. Defendant denies that any of the alleged statements are defamatory. Defendant is
2 without knowledge or information to either admit or deny the remaining allegations in paragraph
3 35 of Plaintiff's Amended Complaint and, therefore, the same are denied.
4

5 36. Defendant denies the allegation in paragraph 36 of Plaintiff's Amended Complaint
6 that the website is the only operational function of AAIMG. Exhibit D speaks for itself, and
7 therefore Plaintiff's characterization of it is denied.

8 37. The statements in Exhibit D speak for themselves and, therefore, the allegations of
9 paragraph 37 are denied. Defendant specifically denies that any of the statements are defamatory.
10

11 38. The statements in Exhibit D speak for themselves and, therefore, the allegations of
12 paragraph 38 are denied.

13 39. The allegations in paragraph 39 of Plaintiff's Amended Complaint are denied.

14 40. Defendant is without knowledge or information to either admit or deny the
15 allegations in paragraph 40 of Plaintiff's Amended Complaint or of its footnote 4 and, therefore, the
16 same are denied.
17

18 41. Defendant is without knowledge or information to either admit or deny the
19 allegations in paragraph 41 and footnote 5 of Plaintiff's Amended Complaint and, therefore, the
20 same are denied.

21 42. Defendant is without knowledge or information to either admit or deny the
22 allegations in paragraph 42 of Plaintiff's Amended Complaint and, therefore, the same are denied.
23

24 43. The statements in Exhibit D speak for themselves and, therefore, the allegations of
25 paragraph 43 of Plaintiff's Amended Complaint are denied.
26

27 44. The statements in Exhibit D speak for themselves and, therefore, the allegations of
28 paragraph 44 of Plaintiff's Amended Complaint are denied.

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1 45. The statements in Exhibit D speak for themselves and, therefore, the allegations of
2 paragraph 45 of Plaintiff's Amended Complaint are denied. Defendant is without knowledge or
3 information to either admit or deny the allegations in footnote 6 and therefore the same are denied.
4

5 46. Defendant is without knowledge or information to either admit or deny the
6 allegations in paragraph 46 of Plaintiff's Amended Complaint and, therefore, the same are denied.
7

8 47. Defendant is without knowledge or information to either admit or deny the
9 allegations in paragraph 47 of Plaintiff's Amended Complaint and, therefore, the same are denied.
10

11 48. Exhibit G speaks for itself and therefore the allegations of paragraph 48 are denied.
12

13 49. The aaimg.com website speaks for itself and therefore the allegations of paragraph
14 49 are denied.
15

16 50. The documents described in paragraph 50 speak for themselves and, therefore, the
17 allegations of paragraph 50 are denied.
18

19 51. The referenced statements in paragraph 51 and Exhibit D speak for themselves and,
20 therefore, the allegations are denied.
21

22 52. Defendant is without knowledge or information to either admit or deny the
23 allegations in paragraph 52 of Plaintiff's Amended Complaint and, therefore, the same are denied.
24

25 53. Defendant is without knowledge or information to either admit or deny the
26 allegations in paragraph 53 of Plaintiff's Amended Complaint and, therefore, the same are denied.
27

28 54. Defendant is without knowledge or information to either admit or deny the
allegations in paragraph 54 of Plaintiff's Amended Complaint and, therefore, the same are denied.

29 55. Exhibit G speaks for itself and therefore, the first sentence of paragraph 55 is denied.
30 Defendant is without knowledge or information to either admit or deny the allegations in paragraph
31 55 of Plaintiff's Amended Complaint and, therefore, the same are denied.
32

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1 56. Exhibit G speaks for itself and, therefore, the first sentence of paragraph 56 is denied.
2 Exhibit D speaks for itself and Defendant denies the second sentence of paragraph 56 of Plaintiff's
3 Amended Complaint. Defendant denies the remaining allegations of paragraph 56 of Plaintiff's
4 Amended Complaint.

5 57. Defendant denies the allegations of paragraph 57 of Plaintiff's Amended Complaint.

6 58. Defendant is without knowledge or information to either admit or deny the
7 allegations in paragraph 58 of Plaintiff's Amended Complaint and, therefore, the same are denied.

8 59. Defendant denies the allegations of paragraph 59 but is without knowledge or
9 information to admit or deny the allegations of footnote 7 of Plaintiff's Amended Complaint and
10 therefore those allegations are denied.

11 60. Defendant is without knowledge or information to either admit or deny the
12 allegations in paragraph 60 and footnote 8 of Plaintiff's Amended Complaint and, therefore, the
13 same are denied.

14 61. Defendant is without knowledge or information to either admit or deny the
15 allegations in paragraph 61 and footnote 9 of Plaintiff's Amended Complaint and, therefore, the
16 same are denied.

17 62. Exhibit H speaks for itself and, therefore, the allegations of paragraph 62 of
18 Plaintiff's Amended Complaint are denied.

19 63. Defendant denies the allegations of paragraph 63 of Plaintiff's Amended Complaint.

20 64. Defendant denies the allegations of paragraph 64 of Plaintiff's Amended Complaint.

21 65. Defendant denies the allegations of paragraph 65 of Plaintiff's Amended Complaint.

22 66. Defendant denies the allegations of paragraph 66 of Plaintiff's Amended Complaint.

23 67. Defendant denies the allegations of paragraph 67 of Plaintiff's Amended Complaint.

24 68. Defendant denies the allegations of paragraph 68 of Plaintiff's Amended Complaint.

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- 1 69. Defendant denies the allegations of paragraphs 69 of Plaintiff's Amended Complaint.
- 2 70. Defendant denies the allegations of paragraph 70 of Plaintiff's Amended Complaint.
- 3 71. Defendant denies the allegations of paragraph 71 of Plaintiff's Amended Complaint.
- 4 72. Defendant denies the allegations of paragraph 72 of Plaintiff's Amended Complaint.
- 5 73. Defendant denies the allegations of paragraph 73 of Plaintiff's Amended Complaint.
- 6 74. Exhibit D speaks for itself and, therefore, the allegations of the first sentence of
7 paragraph 74 are denied. Defendant denies the allegations in the second sentence of paragraph 74
8 of Plaintiff's Amended Complaint.
- 9 75. Exhibit D speaks for itself and the allegations of paragraph 75 are denied. Defendant
10 further denies the allegations in the fourth and final sentence of paragraph 75 of Plaintiff's Amended
11 Complaint.
- 12 76. Defendant denies the allegations of paragraph 76 of Plaintiff's Amended Complaint.
- 13 77. Exhibit D speaks for itself and the allegations of paragraph 77 are denied.
- 14 78. Exhibit D and the AAIMG report speaks for itself and, therefore, the allegations of
15 paragraph 78 purporting to cite Exhibit D and the AAIMG report are denied. Defendant denies the
16 remaining allegations of paragraph 78 of Plaintiff's Amended Complaint.
- 17 79. Exhibit D and the AAIMG report speaks for itself and, therefore, the allegations in
18 paragraph 79 purporting to cite Exhibit D and the AAIMG Report are denied. Defendant denies the
19 remaining allegations of paragraph 79 of Plaintiff's Amended Complaint.
- 20 80. Exhibit D and the AAIMG report speaks for itself and, therefore, the allegations of
21 paragraph 80 purporting to cite Exhibit D and the AAIMG report are denied. Defendant denies the
22 remaining allegations of paragraph 80 of Plaintiff's Amended Complaint.
- 23 ...
- 24 ...

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1 81. Exhibit D and the AAIMG report speaks for itself and, therefore, the allegations of
2 paragraph 81 purporting to cite Exhibit D and the AAIMG report are denied. Defendant denies the
3 remaining allegations of paragraph 81 of Plaintiff's Amended Complaint.
4

5 82. Exhibit D and the AAIMG report speaks for itself and, therefore, the allegations of
6 paragraph 82 purporting to cite Exhibit D and the AAIMG report are denied. Defendant denies the
7 remaining allegations of paragraph 82 of Plaintiff's Amended Complaint.
8

9 83. Exhibit D and the AAIMG report speaks for itself and, therefore, the allegations of
10 paragraph 83 purporting to cite Exhibit D and the AAIMG report are denied. Defendant denies the
11 remaining allegations of paragraph 83 of Plaintiff's Amended Complaint.
12

13 84. Exhibit D and the AAIMG report speaks for itself and, therefore, the allegations of
14 paragraph 84 purporting to cite Exhibit D and the AAIMG report are denied. Defendant denies the
15 remaining allegations of paragraph 84 of Plaintiff's Amended Complaint.
16

17 85. Exhibit D and the AAIMG report speaks for itself and, therefore, the allegations of
18 paragraph 85 purporting to cite Exhibit D and the AAIMG report are denied. Defendant denies the
19 remaining allegations of paragraph 85 of Plaintiff's Amended Complaint.
20

21 86. Exhibit D and the AAIMG report speaks for itself and, therefore, the allegations of
22 paragraph 86 purporting to cite Exhibit D and the AAIMG report are denied. Defendant denies the
23 remaining allegations of paragraph 86 of Plaintiff's Amended Complaint.
24

25 87. Defendant denies the allegations of paragraph 87 of Plaintiff's Amended Complaint.
26

27 88. Defendant denies the allegations of paragraph 88 of Plaintiff's Amended Complaint.
28

FIRST CLAIM FOR RELIEF

29 89. Defendant restates, repeats and incorporates by reference her responses to
30 paragraphs 1 through 88 of the Amended Complaint as if fully set forth herein.
31

90. Defendant denies the allegations of paragraph 90 of Plaintiff's Amended Complaint.

91. Defendant denies the allegations of paragraph 91 of Plaintiff's Amended Complaint.

92. Defendant denies the allegations of paragraph 92 of Plaintiff's Amended Complaint.

93. Defendant denies the allegations of paragraph 93 of Plaintiff's Amended Complaint.

94. Defendant denies the allegations of paragraph 94 of Plaintiff's Amended Complaint.

95. Defendant denies the allegations of paragraph 95 of Plaintiff's Amended Complaint.

96. Defendant denies the allegations of paragraph 96 of Plaintiff's Amended Complaint.

97. Defendant denies the allegations of paragraph 97 of Plaintiff's Amended Complaint.

SECOND CLAIM FOR RELIEF

Defendant has filed a Motion to Dismiss this Claim Pursuant to Fed. R. Civ. P. 12(b)(6). Notwithstanding and without waiving that Motion, Defendant responds to the numbered paragraphs of this Claim because such paragraphs are incorporated by reference in subsequent Claims.

98. Defendant restates, repeats and incorporates by reference her responses to paragraphs 1 through 97 of the Amended Complaint as if fully set forth herein.

99. Defendant denies the allegations of paragraph 99 of Plaintiff's Amended Complaint.

100. Defendant denies the allegations of paragraph 100 of Plaintiff's Amended Complaint.

101. Defendant denies the allegations of paragraph 101 of Plaintiff's Amended Complaint.

THIRD CLAIM FOR RELIEF

Defendant has filed a Motion to Dismiss this Claim Pursuant to Fed. R. Civ. P. 12(b)(6). Notwithstanding and without waiving that Motion, Defendant responds to the numbered paragraphs of this Claim because such paragraphs are incorporated by reference in subsequent Claims.

102. Defendant restates, repeats and incorporates by reference her responses to paragraphs 1 through 101 of the Amended Complaint as if fully set forth herein.

103. Defendant denies the allegations of paragraph 103 of Plaintiff's Amended Complaint.

104. Defendant denies the allegations of paragraph 104 of Plaintiff's Amended Complaint.

105. Defendant denies the allegations of paragraph 105 of Plaintiff's Amended Complaint.

FOURTH CLAIM FOR RELIEF

106. Defendant restates, repeats and incorporates by reference her responses to paragraphs 1 through 105 of the Amended Complaint as if fully set forth herein.

107. Defendant denies the allegations of paragraph 107 of Plaintiff's Amended Complaint.

108. Defendant denies the allegations of paragraph 108 of Plaintiff's Amended Complaint.

109. Defendant denies the allegations of paragraph 109 of Plaintiff's Amended Complaint.

110. Defendant denies the allegations of paragraph 110 of Plaintiff's Amended Complaint.

111. Defendant denies the allegations of paragraph 111 of Plaintiff's Amended Complaint.

112. Defendant denies the allegations of paragraph 112 of Plaintiff's Amended Complaint.

113. Defendant denies the allegations of paragraph 113 of Plaintiff's Amended Complaint.

114. Defendant denies the allegations of paragraph 114 of Plaintiff's Amended Complaint.

115. Defendant denies the allegations of paragraph 115 of Plaintiff's Amended Complaint.

116. Defendant denies the allegations of paragraph 117 of Plaintiff's Amended Complaint.

FIFTH CLAIM FOR RELIEF

Defendant has filed a Motion to Dismiss this Claim Pursuant to Fed. R. Civ. P. 12(b)(6). Notwithstanding and without waiving that Motion, Defendant responds to the numbered paragraphs of this Claim because such paragraphs are incorporated by reference in subsequent Claims.

1 117. Defendant restates, repeats and incorporates by reference her responses to
2 paragraphs 1 through 116 of the Amended Complaint as if fully set forth herein.
3

4 118. Defendant denies the allegations of paragraph 118 of Plaintiff's Amended
5 Complaint.
6

7 119. Defendant denies the allegations of paragraph 119 of Plaintiff's Amended
8 Complaint.
9

10 120. Defendant denies the allegations of paragraph 120 of Plaintiff's Amended
11 Complaint.
12

SIXTH CLAIM FOR RELIEF

13 Defendant has filed a Motion to Dismiss this Claim Pursuant to Fed. R. Civ. P. 12(b)(6).
14 Notwithstanding and without waiving that Motion, Defendant responds to the numbered
15 paragraphs of this Claim because such paragraphs are incorporated by reference in subsequent
16 Claims.
17

18 121. Defendant restates, repeats and incorporates by reference her responses to
19 paragraphs 1 through 120 of the Amended Complaint as if fully set forth herein.
20

21 122. Defendant denies the allegations of paragraph 122 of Plaintiff's Amended
22 Complaint.
23

SEVENTH CLAIM FOR RELIEF

24 123. Defendant restates, repeats and incorporates by reference her responses to
25 paragraphs 1 through 122 of the Amended Complaint as if fully set forth herein.
26

27 124. Defendant denies the allegations of paragraph 124 of Plaintiff's Amended
28 Complaint.
29

30 125. Defendant denies the allegations of paragraph 125 of Plaintiff's Amended
31 Complaint.
32

126. Defendant denies the allegations of paragraph 126 of Plaintiff's Amended Complaint.

EIGHTH CLAIM FOR RELIEF

127. Defendant restates, repeats and incorporates by reference her responses to paragraphs 1 through 126 of the Amended Complaint as if fully set forth herein.

128. Defendant denies the allegations of paragraph 128 of Plaintiff's Amended Complaint.

129. Defendant denies the allegations of paragraph 129 of Plaintiff's Amended Complaint.

130. Defendant denies the allegations of paragraph 130 of Plaintiff's Amended Complaint.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

Defendant Patricia L. Hough does not do business as SABA University School of Medicine.

SECOND AFFIRMATIVE DEFENSE

For the reasons set forth in the Motion to Dismiss filed by Defendant the Second, Third, Fifth and Sixth claims of the Amended Complaint fail to state a claim for relief and should be dismissed pursuant to Fed.R.Civ.P. 12(b)(6).

THIRD AFFIRMATIVE DEFENSE

Plaintiffs Amended Complaint fails to state a claim upon which relief can be granted.

FOURTH AFFIRMATIVE DEFENSE

27 The alleged publications are protected by rights conferred by the Constitution of the
28 United States.

FIFTH AFFIRMATIVE DEFENSE

The statements alleged to be defamatory were and remain true.

SIXTH AFFIRMATIVE DEFENSE

The statements alleged to be defamatory were and remain opinion.

SEVENTH AFFIRMATIVE DEFENSE

The alleged publication of the information complained of was privileged.

EIGHTH AFFIRMATIVE DEFENSE

The publication complained of is privileged as fair comment concerning a matter of public interest.

NINTH AFFIRMATIVE DEFENSE

The damages, if any, suffered by Plaintiff were the results of acts or omissions of third parties for whom the Defendants are not responsible.

TENTH AFFIRMATIVE DEFENSE

The Plaintiff has failed to mitigate its damages, if any.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiff's damages, if any, were caused or aggravated by its own conduct.

TWELFTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred in whole or in part by the applicable statutes of limitation.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the doctrine of estoppel and by its own unclean hands

FOURTEENTH AFFIRMATIVE DEFENSE

This venue and/or forum is not appropriate, and therefore the matter should be transferred and/or dismissed

WHEREFORE, Defendant respectfully requests that this Court enter Judgment dismissing Plaintiff's Amended Complaint, award Defendant attorneys' fees and costs necessitated by this action, and any other relief this Court deems just and equitable.

DATED this 14 day of February, 2006.

ALVERSON, TAYLOR,
MORTENSEN & SANDERS



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Attorney for Defendants
PATRICIA L. HOUGH, M.D.;
DAVID L. FREDRICK; and
ASSOCIATION OF AMERICAN
INTERNATIONAL MEDICAL
GRADUATES, INC.

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CERTIFICATE OF MAILING

I hereby certify that on this 14 day of February, 2006, I did deposit in the United States Post Office, with postage fully prepaid thereon, a copy of the above and foregoing **ANSWER OF ASSOCIATION OF INTERNATIONAL MEDICAL GRADUATES, INC. TO AMENDED COMPLAINT OF PLAINTIFF** addressed to:

Mark G. Tratos, Esq.
F. Christopher Austin, Esq.
Ronald D. Green, Jr., Esq.
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3773 Howard Hughes Pkwy., Ste. 500N
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An Employee of ALVERSON, TAYLOR,
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